

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER
DISTRICT JUDGE

*Durl Welch v. Aurobindo Pharma, USA,
Inc., et al*

**PLAINTIFFS' CROSS NOTICE OF VIDEOTAPED DEPOSITION OF
DR. ALAN KELLER, MD**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Plaintiff will take the cross deposition upon oral examination of Dr. Alan Keller, on **October 27, 2021, at 10:00 a.m. CDT**, and continuing until completion, at 12697 E. 51st Street South, Tulsa, OK, 74146.

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

Paige N. Boldt
Watts Guerra, LLC
5726 West Hausman Rd. Ste. 119
San Antonio, TX 78249
Telephone: (210) 448-0500
E-Mail: pboldt@wattsguerra.com

Date: October 19, 2021

Respectfully submitted,

/s/ Paige N. Boldt
Paige N. Boldt
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October 2021, I caused a true and correct copy of the foregoing Cross Notice of Videotaped Deposition of Dr. Alan Keller to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on October 20, 2021.

This 20th day of October 2021.

/s/ Paige N. Boldt
Attorney for Plaintiff

Exhibit A

Documents to be Produced

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.